

1 Barrett S. Litt, SBN 45527
2 Email: blitt@kmbllaw.com
3 KAYE, MCLANE, BEDNARSKI & LITT
4 975 East Green Street
5 Pasadena, California 91106
6 Telephone: (626) 844-7660
7 Facsimile: (626) 844-7670

8 Carol A. Sobel, SBN 84483
9 Email: carolsobel@aol.com
10 LAW OFFICE OF CAROL A. SOBEL
11 3110 Main Street, Suite 210
12 Santa Monica, California 90405
13 Telephone: (310) 393-3055
14 Facsimile: (310) 451-3858

15 ADDITIONAL COUNSEL LISTED
16 ON NEXT PAGE
17 Attorneys for Plaintiffs

18
19
20 UNITED STATES DISTRICT COURT
21 CENTRAL DISTRICT OF CALIFORNIA

22 CHARMAINE CHUA, ET AL.

23 CASE NO: 2:16-cv-00237-JAK-GJS(x)
24 [HON. JOHN A. KRONSTADT]

25 PLAINTIFFS,

26 VS.
27 JOINT NOTICE OF PROVISIONAL
28 SETTLEMENT AND REQUEST TO
VACATE ALL PENDING DATES

CITY OF LOS ANGELES, ET AL.,

HEARING DATE: JANUARY 14, 2019

DEFENDANTS.

HEARING TIME: 8:30 A.M.

COURTROOM: 10B

TRIAL DATE: _ MARCH 19, 2019 __

TIME: 9:00 A.M.

ACTION FILED: JAN. 13, 2016

1 ADDITIONAL PLAINTIFFS' COUNSEL

2 Paul Hoffman, SBN 71244
3 Email. hoffpaul@aol.com
4 Catherine Sweetser. SBN271142
5 Email. catherine.sdshhh@gmail.com
6 SCHONBRUN, SEPLOW, HARRIS & HOFFMAN
7 732 Ocean Front Walk
8 Venice, California 90291
9 Tel. (310) 396-0731
10 Fax. (310) 399-7040

11 Colleen M. Flynn, SBN 234281
12 Email. cflynnlaw@yahoo.com
13 LAW OFFICE OF COLLEEN FLYNN
14 3435 Wilshire Boulevard, Suite 2910
15 Los Angeles, California 90010
16 Tel. 213 252-9444
17 Fax. 213 252-0091

18 Matthew Strugar, SBN 232951
19 Email. matthewstrugar@gmail.com
20 LAW OFFICE OF MATTHEW STRUGAR
21 2108 Cove Avenue
22 Los Angeles, California 90039
23 Tel: 323 696-2299

24
25
26
27
28

1 The parties advise the Court that they have reached a settlement in principle
2 among counsel. The parties hope to have a final settlement agreement by the end of
3 February (which timetable factors in the time for the normal back and forth involved
4 in any class settlement). Once the settlement agreement has been drafted, the parties
5 estimate a four to six week period for it to be presented to and approved by the Los
6 Angeles City Council. That would put the target date for an approved settlement
7 agreement of mid-April (possibly earlier). Thus, the parties hope to submit a
8 preliminary approval motion and accompanying documents (including draft class
9 notice, claim form and proposed preliminary approval order) by the end of April or
10 early May.

11 Based on the foregoing, the parties request that the Court vacate all dates
12 (including regarding the currently pending motion for general damages) and set a
13 status conference for May 13, 2019, to be vacated in the event that the motion for
14 preliminary approval has not been filed before that.

16 | DATED: January 10, 2019 Respectfully Submitted,

KAYE, MCLANE, BEDNARSKI & LITT
LAW OFFICES OF CAROL SOBEL
SCHOENBRON, DESIMONE, ET AL.
LAW OFFICE OF COLLEEN FLYNN
LAW OFFICE OF MATTHEW STUGAR

By: /s/ Barrett S. Litt
Barrett S. Litt
Attorneys for Plaintiffs

1 MICHAEL N. FEUER, City Attorney
2 THOMAS H. PETERS, Chief Asst. City
3 Attorney
4 Cory M. Brente, Sr. Asst. City Attorney
5 LOS ANGELES CITY ATTORNEY'S
6 OFFICE

7 By: /s/ Geoffrey Plowden
8 Geoffrey Plowden
9 Attorneys for Defendants
10 (Permission granted to affix defense counsel's
11 signature on his behalf)